

1 [Counsel Listed Below]  
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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO

12 UniRAM TECHNOLOGY, INC., a California  
13 corporation,

14 Plaintiff,

15 v.

16 MONOLITHIC SYSTEM TECHNOLOGY, a  
17 Delaware corporation; TAIWAN  
18 SEMICONDUCTOR MANUFACTURING  
COMPANY LTD., a Taiwan corporation, and  
TSMC NORTH AMERICA, a California  
corporation,

19 Defendants.

20 Case No. CV 04-01268-VRW  


21 **STIPULATED MOTION AND  
[PROPOSED] ORDER TO AMEND  
PRETRIAL DISCOVERY  
DEADLINES**

22 **STIPULATED MOTION AND [PROPOSED] ORDER TO  
AMEND PRETRIAL DISCOVERY DEADLINES**

23 Pursuant to the Court's April 19, 2006, Case Management Order, Docket No. 170  
24 ("CMO"), in the above-referenced matter, UniRAM Technology, Inc., Monolithic System  
25 Technology, Taiwan Semiconductor Manufacturing Company Ltd., and TSMC North America  
26 (collectively, "the Parties") have continued to engage in discovery processes. Nevertheless, the  
27 parties believe that a slight modification to the discovery schedule—the effect of which would be  
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STIPULATED MOTION AND [PROPOSED]  
ORDER TO AMEND PRETRIAL DISCOVERY  
DEADLINES

Case No. CV-04-01268 VRW

1 to provide an additional month for fact discovery to be accounted for by shortening the period  
 2 between the close of discovery and the deadline for dispositive motions—will be beneficial to  
 3 their preparation of the case. Accordingly, the Parties jointly and respectfully move that the  
 4 Court allow approximately one extra month per the following deadlines:

	<b>CMO deadline</b>	<b>Stipulated deadline</b>
7	DISCOVERY CUT-OFF	September 15, 2006 ( <i>see CMO</i> at 2)      October 13, 2006
9	EXPERT WITNESS	September 29, 2006 ( <i>see CMO</i> at 2)      October 27, 2006
10	REPORTS	
11	REBUTTAL EXPERT	October 13, 2006 ( <i>see CMO</i> at 2)      November 10, 2006
12	WITNESS REPORTS	
13	EXPERT WITNESS	November 10, 2006 ( <i>see CMO</i> at 2)      December 8, 2006
14	DISCOVERY CUT-OFF	

16 All other deadlines in the CMO, including the deadlines for dispositive motions and the trial date,  
 17 would remain the same.

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STIPULATED MOTION AND [PROPOSED]  
 ORDER TO AMEND PRETRIAL DISCOVERY  
 DEADLINES

1 Dated: July 5, 2006

By: \_\_\_\_\_/s/

2 George M. Schwab  
3 Attorneys for Plaintiff  
UniRAM Technology Inc.

4 Dated: July 5, 2006

5 By: \_\_\_\_\_/s/

6 Edward R. Reines  
7 Attorneys for Defendants  
Taiwan Semiconductor  
Manufacturing Company, Ltd, and  
TSMC North America

8 Dated: July 5, 2006

9 By: \_\_\_\_\_/s/

10 Mark C. Scarsi  
11 Attorneys for Defendant  
Monolithic System Technology,  
Inc.

12 **ORDER**

13 Pursuant to stipulation, it is ORDERED that the deadlines for the following events, set  
14 forth initially in this Court's Case Management Order, Docket No. 170, be amended as follows:

15 Discovery cut-off..... October 13, 2006  
16 Expert witness reports..... October 27, 2006  
17 Rebuttal expert witness reports..... November 10, 2006  
18 Expert witness discovery cut-off..... December 8, 2006  
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20 The hearing on dispositive motions remains scheduled for February 15, 2007, at 2:00 p.m., and  
21 such motions must still be timely filed in accordance with Civil LR 7.

22 Dated: 7/13/06, 2006

23 By:   
Hon. Vaughn R. Walker